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October 3, 2023

VIA ECF

Hon. P. Kevin Castel U.S. District Court, Southern District of New York 500 Pearl Street New York, NY 10007

Re:

Extension of time part only fronted part only for November 1, 2023 in port of Doe v. Uniquest Delaware, LLC, et. al — Case No.: 1:23-cv-7980-PKC

Dear Judge Castel:

We are counsel for Defendant Brookwood Hospitality, LLC ("Brookwood") in the above matter. Please let this letter serve as Brookwood's request for an extension of time to respond to Plaintiff's Complaint through November 3, 2023.

In support of Brookwood's request, please be advised that Brookwood's current deadline to respond to the Complaint is October 5, 2023. This is Brookwood's first request for an extension of time. The reason for the request of an extension of time is that our office was just engaged by Brookwood and needs an extension of time in order to investigate and address the allegations in the Complaint. Given that the Court has scheduled the Rule 16 Case Management Conference for November 17, 2023, the proposed November 3, 2023 date complies with the Court's Rule that there be at least 14-days between Brookwood's date to respond to the Complaint and the Case Management Conference.

Pursuant to my communication with Plaintiff's counsel, Plaintiff has no objection to this request.

Thank you for your courtesy and cooperation in this matter.

Very truly yours,

LIPPES MATHIAS LLP

/s Brendan H. Little

Brendan H. Little

BHL/bmo